

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON



JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

**IN RE: ETHICON, INC., PELVIC  
REPAIR SYSTEM PRODUCTS  
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02327  
MDL No. 2327**

**THIS DOCUMENT RELATES TO  
THE CASES ON THE EXHIBIT  
ATTACHED HERETO**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

**JOINT MOTION TO DISMISS WITH PREJUDICE AND TRANSFER TO MDL 2187**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs. The dismissal of these cases relates only to the Ethicon Defendants. Plaintiffs continue to pursue claims against C.R. Bard, Inc., and respectfully request the Court transfer this case to MDL 2187.

Respectfully submitted,

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**EXHIBIT A**

2:16-cv-10268	Heckers v. Ethicon
2:16-cv-10279	Holt v. Ethicon